

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: SHAMAR DAVID : Bankruptcy No. 22-12470DJB  
Debtor : Chapter 13

**ANSWER TO MOVANT'S MOTION FOR RELIEF**

SHAMAR DAVID, through her attorney, Zachary Perlick, Esquire, answers Movant's Motion for Relief, and sets forth in support thereof as follows:

1. - 5. Admitted.

6. - 7. Admitted in part. Denied in part. Debtor has tendered post-petition payments to movant, however, Debtor admits to a small post-petition delinquency to movant which can be cured over a short time.

8. Denied.

9. Denied. Movant is adequately protected by debtor's direct payments to the mortgagee, payments to the Chapter 13 Trustee, equity in the property and insurance coverage.

10. No answer is required.

WHEREFORE, Debtor prays that movant's Motion for Relief be  
DENIED

Respectfully submitted,

/s/Zachary Perlick/  
ZACHARY PERLICK, ESQUIRE